

Exhibit G

**COMPARISON OF LEAD EXPOSURES ATTRIBUTABLE TO CANDY AT .1 PPM
AND LIPSTICK AT AN ALLEGED CONCENTRATION OF .65 PPM**

1) Allegations of Plaintiff's Complaint:

- Women inadvertently ingest approximately four pounds of lipstick in their lives (§ 23)
- L'Oreal lipstick allegedly contains up to .65 ppm lead. (§ 31)
- FDA's standard for lead in candy is .1 ppm, protects children, and is an acceptable concentration. (§§ 29, 31, 32)
- Most women in the United States start using lipstick by the age of 10. (§ 24)

2) Facts Judicially noticeable:

- FDA based its standard for lead in candy on an assumption that daily candy serving sizes equal or exceed 21 grams. (Exhibit F)
- According to the US Social Security Administration's 2004 Actuarial Table, found at <http://www.ssa.gov/OACT/STATS/table4c6.html>, the remaining life expectancy of a currently ten year old girl is 70.58 years.

3) Calculation of Daily Exposure to Lead From Lipstick

- The alleged exposure period is 70 years (80-10)
- 70 years = 25,550 days
- 4 pounds = 64 oz
- 64 oz = 1814.369 grams
- $1814.369 \text{ grams} / 25,550 \text{ days} = .071 \text{ grams/day}$
- .65 parts per million = .000065%
- .000065% of .071 grams = **.000000046 grams lead/day**

4) Calculation of Daily Exposure to Lead from one 21 gram serving of candy for same period of time:

- 21 grams/day
- .1 ppm = .00001%

- .00001% of 21 grams = **.0000021 grams lead/day**

5) Comparison of daily values: Daily intake from candy at .1 ppm is **45.65 times higher than daily intake from exposure to lipstick containing .65 ppm of lead.** (.00021/.0000047 = 45.65)